

[Parties and Counsel Listed on Signature Pages]

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

*People of the State of California, et al. v. Meta
Platforms, Inc., et al.*

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**META AND STATE AGS'
STIPULATION AND [PROPOSED]
ORDER EXTENDING CERTAIN
EXPERT AND RELATED PRETRIAL
DEADLINES**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, the State Attorneys General (“State AGs”) and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned counsel, hereby stipulate as follows:

1. Under the current case schedule, the deadline for the State AGs to submit opening expert reports is May 16, 2025; for Meta to submit responsive expert reports is July 9, 2025; and for the State AGs to submit rebuttal reports is July 30, 2025. *See* ECF 1290, at 2–3.

2. The Parties have met and conferred over several weeks and agree that, to facilitate the completion of necessary fact and expert discovery and to best prepare the State AGs’ claims (and Meta’s defenses) for trial, good cause exists to extend these deadlines for four of the State AGs’ expert reports (and Meta’s and the State AGs’ corresponding responsive and rebuttal reports) by approximately 2.5 months to August 1, 2025, with the ability for the corresponding deadlines to advance if the State AGs submit those four expert reports prior to August 1, 2025. *See id.* at 2 (similarly providing that “[s]hould plaintiffs submit a non-case-specific expert report prior to the [current] May 16, 2025 deadline, then the schedule will be advanced per the timetable below”).

3. Certain discovery from Meta that the State AGs intend to incorporate into certain State AG opening expert reports, including productions of structured data, supplemental interrogatory responses, and 30(b)(6) deposition testimony, remains outstanding, including certain items that the Parties are still negotiating; and due to the prior extension of time for the completion of certain fact discovery into the State AGs’ claims by Meta, certain discovery that Meta may need to incorporate into Meta’s responsive expert reports remains outstanding. *See* ECF 1696, at 4.¹

¹ The Parties are also awaiting a ruling from Magistrate Judge Kang on a Joint Letter Brief regarding disputes over the scope of Meta’s 30(b)(6) depositions of States asserting consumer protection claims. *See* ECF No. 1807.

1 4. The Parties have separately agreed to schedule the State AGs' 30(b)(6) deposition of Meta
2 on most topics for dates no later than June 20, 2025, with the exception of a handful of topics relating to
3 structured data for which a later date may be required.²

4 5. The Parties thus agree, subject to Court approval, to extend the deadline from May 16,
5 2025 to August 1, 2025, for four State AG opening expert reports: two reports concerning liability pursuant
6 to both state consumer protection statutes and COPPA; one report concerning monetary remedies; and
7 one report concerning injunctive remedies—provided, however, that the State AGs may submit the four
8 opening expert reports prior to the August 1, 2025 deadline.

9 6. The Parties also agree, subject to Court approval, to extend by approximately 2.5 months
10 the existing deadlines for (a) responsive and rebuttal reports and Rule 702 motions related to these four
11 reports and responsive reports; (b) dispositive motions pertaining to the State AGs' claims; and (3) certain
12 other pretrial deadlines for the State AGs' claims, as reflected in the chart below—provided, however,
13 that if the State AGs submit their four opening expert reports prior to the August 1, 2025 deadline, these
14 later deadlines will adjust earlier by a commensurate amount per the timetable below, with Meta and the
15 State AGs to meet and confer and agree on (and submit to the Court) specific dates for these later
16 deadlines.

17 7. Each of the four expert reports for which the Parties agree to extend the deadline is specific
18 to the State AGs' claims. The State AGs do not share these experts with the Personal Injury and School
19 District ("PI/SD") Plaintiffs.

20 8. None of these four expert reports addresses general causation issues. Therefore, all of
21 Plaintiffs' (including the PI/SD Plaintiffs' and State AGs') general causation expert reports will be
22 submitted by the current deadline of May 16, 2025.

23 9. This extension will not interfere with or otherwise disrupt the current schedule for (a) the
24 exchange of all other expert reports (including the PI/SD Plaintiffs' expert reports and the State AGs'
25

26 _____
27 ² The Parties nonetheless agree to endeavor to complete the deposition on the structured data-related
28 topics by June 20, 2025.

other expert reports); (b) Defendants' and Plaintiffs' Rule 702 motions challenging these other expert reports or the reports of experts Meta may submit in response to these other expert reports; or (c) Defendants' motions for summary judgment as to the PI/SD Plaintiffs.

10. Meta and the State AGs expressly reserve the right to file Rule 702 motions challenging any of the four expert reports for which an extension of deadlines has, subject to Court approval, been agreed, or experts whose reports Meta will submit in response to those experts, regardless of the fact that Meta or the State AGs will previously have filed Rule 702 motions (by the dates set under the current schedule) challenging other Plaintiff or Meta experts, including on potentially overlapping issues. The Parties also reserve all rights regarding the number of Rule 702 motions any party is allowed to file in the case pursuant to the Court's Standing Order in Civil Cases.

11. This Court has previously extended expert report, Rule 702 motion, dispositive motion, and pretrial deadlines, on agreement of all parties to the MDL as part of an MDL-wide schedule extension. *See* ECF 1159.

12. The changes in these deadlines will not affect other deadlines in the case schedule. In particular, previously ordered deadlines to exchange preliminary witness lists, to meet and confer regarding whether any additional discovery may be needed, to submit a joint status report on the results of that meet-and-confer, and to submit joint letter briefs on any remaining discovery disputes, will remain the same. *See* ECF No. 1290.

13. Therefore, the Parties agree, subject to the Court's approval, that the following deadlines will apply:

Event	Current Deadline	Proposed Deadline*
<i>*Should the State AGs submit their four AG-specific expert reports prior to August 1, 2025, then the schedule will be advanced per the timetable below, with 1 extra week added for any deadline falling over the week of November 24, and 2 extra weeks added for any deadline falling over the weeks of December 22-January 2.</i>		
Non-Case Specific and Causation Experts: Plaintiffs' Opening Reports	May 16, 2025	August 1, 2025 (for the State AGs' four AG-specific expert reports)
Non-Case Specific and Causation Experts:	July 9, 2025	September 26, 2025 (for Meta's responsive reports to the State AGs' four AG-specific expert

Event	Current Deadline	Proposed Deadline*
Defendants' Responsive Reports		reports), <i>or approximately 8 weeks after Opening Reports, whichever is sooner</i>
Non-Case Specific and Causation Experts: Plaintiffs' Rebuttal Reports	July 30, 2025	October 24, 2025 (for the State AGs' rebuttal reports in response to Meta's responsive reports to the State AGs' four AG-specific expert reports), <i>or 4 weeks after Responsive Reports, whichever is sooner</i>
Close of Expert Discovery	August 27, 2025	November 7, 2025 (for depositions of the State AGs' four AG-specific experts, Meta's responsive experts, and any AG rebuttal experts), <i>or approximately 2 weeks after Rebuttal Reports</i>
Exchange Preliminary Proposed Jury Instructions	September 22, 2025	December 12, 2025 (for State AGs' claims), <i>or 4 weeks after the Close of Expert Discovery, whichever is sooner</i>
Dispositive and Rule 702 (Daubert) Motions: Opening Briefs	September 24, 2025	December 12, 2025 (for (a) Meta's and the State AGs' dispositive motions as to the State AGs' claims and Meta's defenses to those claims and (b) Meta's and the State AGs' Rule 702 motions as to the State AGs' four AG-specific experts and Meta's responsive experts), <i>or 4 weeks after the Close of Expert Discovery, whichever is sooner</i>
File Proposed/Disputed Jury Instructions	October 27, 2025	January 23, 2026 (for State AGs' claims), <i>or approximately 4 weeks after Opening Briefs, whichever is sooner</i>
Dispositive and Rule 702 (Daubert) Motions: Opposition Briefs	October 27, 2025	January 23, 2026 (for (a) the State AGs' and Meta's oppositions to dispositive motions as to the State AGs' claims and Meta's defenses to those claims and (b) the State AGs' and Meta's oppositions to Rule 702 motions as to the State AGs' four AG-specific experts and Meta's responsive experts), <i>or approximately 4 weeks after Opening Briefs, whichever is sooner</i>
Dispositive and Rule 702 (Daubert) Motions: Reply Briefs	November 25, 2025	February 20, 2026 (for (a) Meta's and the State AGs' replies in support of dispositive motions as to the State AGs' claims and Meta's defenses to those claims and (b) Meta's and the State AGs' replies in support of Rule 702 motions as to the State AGs' four AG-specific experts and Meta's responsive experts), <i>or approximately 4 weeks after Opposition Briefs, whichever is sooner</i>

IT IS SO STIPULATED AND AGREED.

Respectfully submitted,

DATED: May 12, 2025

By: /s/ Megan O'Neill

ROB BONTA

Attorney General
State of California

Nicklas A. Akers (CA SBN 211222)
Senior Assistant Attorney General
Bernard Eskandari (SBN 244395)
Emily Kalanithi (SBN 256972)
Supervising Deputy Attorneys General
Nayha Arora (CA SBN 350467)
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer (CA SBN 336428)
Marissa Roy (CA SBN 318773)
Brendan Ruddy (CA SBN 297896)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480
Megan.Oneill@doj.ca.gov

*Attorneys for Plaintiff the People of the State of
California*

PHILIP J. WEISER

Attorney General
State of Colorado

/s/ Krista Batchelder

Krista Batchelder, CO Reg. No. 45066,
pro hac vice
Deputy Solicitor General
Shannon Stevenson, CO Reg. No. 35542, *pro hac vice*
Solicitor General

1 Elizabeth Orem, CO Reg. No. 58309, *pro hac vice*
2 Assistant Attorney General
3 Colorado Department of Law
4 Ralph L. Carr Judicial Center
5 Consumer Protection Section
6 1300 Broadway, 7th Floor
7 Denver, CO 80203
8 Phone: (720) 508-6651
9 krista.batchelder@coag.gov
10 Shannon.stevenson@coag.gov
11 Elizabeth.orem@coag.gov

12 *Attorneys for Plaintiff State of Colorado, ex rel.*
13 *Philip J. Weiser, Attorney General*

14 **RUSSELL COLEMAN**
15 Attorney General
16 Commonwealth of Kentucky

17 /s/ Philip Heleringer

18 J. Christian Lewis (KY Bar No. 87109),
19 *Pro hac vice*
20 Philip Heleringer (KY Bar No. 96748),
21 *Pro hac vice*
22 Zachary Richards (KY Bar No. 99209),
23 *Pro hac vice*
24 Daniel I. Keiser (KY Bar No. 100264),
25 *Pro hac vice*
26 Matthew Cocanougher (KY Bar No. 94292),
27 *Pro hac vice*
28 Assistant Attorneys General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601
CHRISTIAN.LEWIS@KY.GOV
PHILIP.HELERINGER@KY.GOV
ZACH.RICHARDS@KY.GOV
DANIEL.KEISER@KY.GOV
MATTHEW.COCANOUGH@KY.GOV
Phone: (502) 696-5300
Fax: (502) 564-2698

Attorneys for Plaintiff the Commonwealth of Kentucky

MATTHEW J. PLATKIN
Attorney General
State of New Jersey

/s/ Kashif T. Chand

Kashif T. Chand (NJ Bar No. 016752008),

Pro hac vice

Section Chief, Deputy Attorney General

Thomas Huynh (NJ Bar No. 200942017),

Pro hac vice

Assistant Section Chief, Deputy Attorney General

Verna J. Pradaxay (NJ Bar No. 335822021),

Pro hac vice

Mandy K. Wang (NJ Bar No. 373452021),

Pro hac vice

Deputy Attorneys General

New Jersey Office of the Attorney General,

Division of Law

124 Halsey Street, 5th Floor

Newark, NJ 07101

Tel: (973) 648-2052

Kashif.Chand@law.njoag.gov

Thomas.Huynh@law.njoag.gov

Verna.Pradaxay@law.njoag.gov

Mandy.Wang@law.njoag.gov

Attorneys for Plaintiffs New Jersey Attorney General

and the New Jersey Division of Consumer Affairs

Matthew J. Platkin, Attorney General for the State of

New Jersey, and Cari Fais, Director of the New Jersey

Division of Consumer Affairs

By: /s/ Ashley M. Simonsen

COVINGTON & BURLING LLP

Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*
Paul W. Schmidt, *pro hac vice*
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: + 1 (202) 662-6000
Facsimile: + 1 (202) 662-6291
Email: pajones@cov.com

*Attorney for Defendants Meta Platforms, Inc.;
Instagram, LLC; Meta Payments, Inc.; and Meta
Platforms Technologies, LLC*

SIGNATURE CERTIFICATION

Under Civ. L.R. 5-1(h)(3), I, Ashley M. Simonsen, hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: May 12, 2025

/s/ Ashley M. Simonsen

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2
3
4 DATED:

5 YVONNE GONZALEZ ROGERS
6 UNITED STATES DISTRICT JUDGE
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28